Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)
	)
Applications of Susan L. Uecker for Renewal of Licenses in the AMTS, 220 MHz, and MAS Services	)))

ORDER

Adopted: September 1, 2026 **Released: September 1, 2026**

By the Chief, Broadband Division, Wireless Telecommunications Bureau:

I. INTRODUCTION

1. In this Order, we grant waivers to allow the court-ordered receivership of Susan L. Uecker (Receiver or Applicant), on behalf of several entities formerly controlled by the late Warren Havens, to renew various licenses that ultimately will be assigned to Locke Wireless LLC. Specifically, these actions relate to: nine Automated Maritime Telecommunications System (AMTS) stations[1] (hereafter, "the AMTS Licenses") initially held by Verde Systems LLC (Verde) and Environmentel LLC (Environmentel);[2] a 220 MHz License[3] initially held by Environmentel;[4] and 352 Multiple Address System (MAS) licenses initially held by Intelligent Transportation & Monitoring Wireless LLC (ITMW).[5] We grant this relief based on the unique set of circumstances present here, subject to the conditions described below, to resolve long running bankruptcy and other litigation, as well as to facilitate deployment on underutilized narrowband spectrum.

[1] Call Signs WQCP808 (AMT005 – Great Lakes), WQCP810 (AMT001 – Northern Atlantic), WQCP811 (AMT002 – Mid-Atlantic), WQCP812 (AMT003 – Southern Atlantic), WQCP813 (AMT009 – Alaska), WQCP814 (AMT010 – Mountain), WQCP815 (AMT004 – Mississippi River), WQCP816 (AMT006 – Southern Pacific), and WQCP817 (AMT007 – Northern Pacific).

[2] *See* ULS File Nos. 0011534846, 0011534854, 0011534865, 0011534873, 0011534903, 0011534905, 0011534915, 0011534918, and 0011534920. The Receiver has also filed several lease extension applications on behalf of lessors, Verde and Environmentel, for all of the AMTS Licenses except for WQCP813, to lessee Choctaw Holdings, LLC, for one year following renewal of the subject AMTS Licenses. *See* ULS File Nos. 0011541126 (WQCP808, WQCP815, WQCP816, and WQCP817) and 0011541047 (WQCP810, WQCP811, WQCP812, and WQCP814). The Receiver has also filed lease applications on behalf of lessor, Environmentel, to lessee, the National Railroad Passenger Corporation (Amtrak), for the full ten-year term of the subject AMTS Licenses post renewal. *See* ULS File No. 0011537976 (WQCP810 and WQCP811). These applications are pending in ULS and will be resolved following the adoption of this Order.

[3] Call Sign WQIM619 (BEA017 – Roanoke, VA-NC-WV).

[4] *See* ULS File No. 0008139081. We also grant retroactive lease extension applications on behalf of Environmentel for its 220 MHz License to lessee, Southside Electric Cooperative (SEC). *See* Notice of Lease Extension and Request for Waiver of § 1.9020(h), by Susan L. Uecker, ULS File no. 0008888568 (filed Nov. 20, 2019) ("Section 1.9020(h) Waiver Request") and Notice of Lease Extension and Request for Waiver of § 1.9020(m), by Susan L. Uecker, ULS File no. 0008888644 (filed Nov. 20, 2019, amended May 28, 2026) ("Section 1.9020(m) Waiver Request"). We also grant Environmentel's related construction notice. *See* ULS File No. 0008154916

[5] *See* Appendix A attached hereto.

II. BACKGROUND

2. *Description of the Applicants*. Verde Systems LLC, Environmentel LLC, and Intelligent Transportation & Monitoring Wireless LLC are FCC Licensees subject to an estate placed under the court-ordered receivership of Susan L. Uecker.[6] The estate consists of several entities formerly controlled by the late Warren Havens.[7] Over time, various Havens-controlled entities – including Verde Environmentel, and ITMW – acquired numerous FCC licenses across multiple services. A former partner of Havens, Dr. Arnold Leong, sued Havens in the Superior Court of Alameda County, California ("the Alameda Court") regarding their respective ownership interests in these various entities and the conduct of the partnership between Havens and Leong. On November 16, 2015, the Alameda Court entered an order appointing Susan L. Uecker as Receiver to take control of all of Havens's FCC license-holding entities, including Verde, Environmentel, and ITMW.[8] Under the Receivership Order, the Receiver must continue to maintain and administer the licenses in the estate subject to construction and renewal deadlines.[9]

3. *Procedural History of the Receivership*. In early 2016, pursuant to the Receivership Order, the Commission accepted applications filed by the Receiver for the involuntary transfer of control to her of the FCC licenses of several entities formerly controlled by Warren Havens, including Verde, Environmentel, and ITMW, and no timely petition for reconsideration was filed.[10] As a consequence, all of the licenses that were issued to Verde, Environmentel, and ITMW, and other entities formerly controlled by Havens are now under the exclusive control of the Receiver. Further details about this litigation and the appointment of the Receiver are available in the Wireless Telecommunications Bureau's (Bureau) decision rejecting Havens's various petitions challenging Leong's qualifications to hold Commission licenses and the appointment of the Receiver.[11] The Bureau Order also granted Leong's declaratory ruling to remove any uncertainty about the Receiver's ability to effectuate assignment of the licenses to third parties in order to distribute the proceeds in accordance with the court's judgment.[12]

4. Following an arbitration proceeding between Mr. Havens and Dr. Leong, the arbitration award in favor of Dr. Leong, and a subsequent settlement between Dr. Leong, Mr. Havens' Estate, and Janet Gayle Havens, on July 3, 2025, the Alameda Court issued an order approving the settlement and

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[6] *See Arnold Leong v. Warren Havens, et al.*, Case No. 2002-070640, *Order Appointing Receiver After Hearing and Preliminary Injunction* (Nov. 16, 2015), aff'd, Case No. A147027, 2017 WL 3633282 (Cal. Ct. App. Aug. 23, 2017) (Receivership Order). After the California Court of Appeal affirmed the Court's order appointing the Receiver to take control of these entities, and the Supreme Court of California denied review, the Court's decision that the Receiver should control the entities became final. *See Leong v. Havens*, Case Nos. A149113 et al., 2019 WL 5557524, at *2 (Cal. Ct. Ap. Oct. 23, 2019).

[7] *See* Assignment Application at 1.

[8] *See id*.

[9] *See generally* Receivership Order at 4.

[10] *See* ULS File Nos. 0007060862, 0007060898, 0007061808, 0007061828, 0007061847, 0007061898 (all filed Dec. 17, 2015). Because no petition for reconsideration was filed within the statutorily mandated 30-day period beginning with public notice of the acceptance of the applications, the Commission's action is administratively final. See 47 U.S.C. § 405. Havens, however, filed numerous pleadings collaterally attacking the acceptance of the applications. A non-exhaustive list of the pleadings is available at https://wireless2.fcc.gov/UlsApp/ApplicationSearch/applAdminPleadings.jsp?applID=9367669.

[11] *See Skybridge Spectrum Foundation, Telesaurus Holdings GB LLC, Verde Systems LLC, Environmentel LLC, Environmentel-2 LLC, Intelligent Transportation & Monitoring Wireless LLC, V2G LLC*, EB Docket No. 11-71, Memorandum Opinion and Order, 37 FCC Rcd 4731 (WTB 2022) (Bureau Order).

[12] *See id*. Pursuant to the Court's judgment, these proceeds are to be distributed between Leong and Havens. We have previously ordered that any proceeds intended for Havens be placed into escrow pending the resolution of the Commission's assessment of Havens's character qualifications to be a licensee. *See id*. at para. 34.

directing the Receiver to assign the Licenses to Assignee ("Settlement Order").[13] Specifically, the Settlement Order compels the Receiver to "apply to the FCC for approval of transfer of all FCC licenses held by the LLC Entities in Receivership to Leong's designee Locke Wireless LLC…."[14] The Assignment Applications will implement the Receivership Order and will facilitate the conclusion of the receivership after over 10 years of Alameda Court supervision but cannot occur until after the licenses have been renewed.

5. *220 MHz License WQIM619*. On March 19, 2018, the Receiver timely filed a renewal application on behalf of Environmentel, claiming that Environmentel demonstrated substantial service at renewal under section 90.743(a) for WQIM619 (BEA017 – Roanoke, VA-NC-WV).[15] This license was also subject to a final buildout requirement, the deadline for which was also March 19, 2018. Accordingly, on March 30, 2018, the Receiver filed a timely notice of construction claiming that Environmentel fulfilled the two-thirds buildout requirement through a lease to Southside Electrical Cooperative.[16] However, Environmentel had already allowed the lease with SEC to expire on September 15, 2014, prior to filing the renewal application. SEC has utilized (and continues to utilize) the 220 MHz License to construct and operate a private, internal network for fixed telemetry and Supervisory Control and Data Acquisition ("SCADA") since 2013, though not authorized to do so after expiration of the lease in 2014. At the time of the second buildout requirement in 2018, the Receiver failed to demonstrate operations over two-thirds of the geographic area of the license, due in large part to the fact that the lease upon which it relied was no longer active. The Receiver explained that during this period, she was unable to determine the status of the contractual agreement between Environmentel and SEC.[17]

6. After consulting with the Alameda Court and SEC, the Receiver elected to seek retroactive lease extensions of the lease. On November 20, 2019, the Receiver filed a Lease extension with a waiver of § 1.9020(h)[18] seeking a retroactive extension of the lease from September 16, 2014 through the end of the license term on March 19, 2018.[19] This application and waiver request is pending and must be resolved before we can renew WQIM619. The Receiver maintains that at the time of the second buildout filing, SEC was providing coverage to 64.8% of the population, just shy of the two-thirds coverage requirement.[20] She argues that it would not be in the public interest to cancel the 220 MHz License in light of this level of service which is being provided in support of critical infrastructure that directly impacts public safety.[21] Currently, our records indicate that SEC is providing service to 61.27% of the population in the geographic area of the license.

7. On November 20, 2019, the Receiver filed a second lease extension with a request for a waiver of section 1.9020(m)[22] seeking a retroactive renewal of the lease from March 20, 2018, through

[13] *See Stipulation and Order to Implement Settlement*, Case No. 2002-070640, July 3, 2025. Mr. Havens died intestate on June 28, 2024. Janet Gayle Havens is Mr. Havens' sister and sole surviving heir.

[14] *Id*.

[15] *See* ULS File No. 0008139081. Section 90.473(a) has since been repealed.

[16] *See* ULS File No. 0008154916.

[17] *See* Notice of Lease Extension and Request for Waiver of § 1.9020(h), by Susan L. Uecker, ULS File no. 0008888568 at 1 (filed Nov. 20, 2019).

[18] 47 CFR § 1.9020(h) (expiration, extension, or termination of a spectrum leasing arrangement).

[19] *See* Section 1.9020(h) Waiver Request.

[20] *See* Substantial Service Showing by Environmentel LLC, ULS File No. 0008139081 at 3 (filed Mar. 19, 2018).

[21] *See id*. at 4-5.

[22] 47 CFR § 1.9020(m) ("The Commission must be notified of the renewal of the spectrum manager leasing arrangement at the same time that the licensee submits its application for license renewal…").

March 19, 2023,[23] and amended the application on May 28, 2026, to extend the lease period until the end of the license term upon renewal (*i.e.*, March 20, 2018 through March 19, 2028).[24] This application and waiver request remains pending and is contingent upon the renewal of WQIM619.

8. *AMTS (Automated Maritime Telecommunications System) Public Coast Licenses.* On April 21, 2025, a few days ahead of the April 25, 2025 expiration of the licenses, the Receiver filed timely applications to renew eleven AMTS Licenses, including the nine licenses that are the subject of this Order.[25] The Receiver initially sought to renew the licenses pursuant to the streamlined "safe harbor" application process afforded partitioned or disaggregated licenses without a performance requirement, for the first renewal application filed after October 1, 2020.[26] However, Commission staff advised counsel for the Receiver that nine of the eleven AMTS licenses in question were not eligible for the safe harbor, but rather would be required to make a detailed renewal showing under section 1.949(f).[27] Accordingly, on August 27, 2025, the Receiver submitted amended renewal applications for all nine licenses, withdrew her safe harbor claim for the nine licenses, and presented her executed leases, as well as her ongoing efforts to lease the licenses under her supervision, as sufficient evidence of performance over the license term to warrant renewal.[28]

9. As evidence of substantial service, the Receiver provided service showings based on spectrum manager lease arrangements with Choctaw Holding, LLC and the National Railroad Passenger Corporation (Amtrak). The Choctaw leases are new lease agreements which commenced about a month before the expiration of the licenses.[29] Pursuant to the lease arrangement, Choctaw uses the leased spectrum to support "critical operations across oil [and] gas, utilities, and transportation."[30] The original Amtrak leases associated with AMTS license WQCP810 (L000014987-988 and L000015275) and AMTS license WQCP811 (L000014989-990) had been in place for some time, commencing in March 2015, and were extended on May 6, 2015 following the renewal of these licenses that same year. Pursuant to the lease arrangement, Amtrak uses the leased spectrum for Positive Train Control. No leases have been entered into under AMTS license WQCP813.[31]

10. *MAS Licenses*. The MAS licenses at issue here originally were assigned to ITMW, which won 352 MAS licenses in Auction 59 in May 2005. Under section 101.1325(b) of the Commission's

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[23] *See* Section 1.9020(m) Waiver Request.

[24] *See id*. (Form 608, amended May 28, 2026).

[25] Two of the renewal applications (for AMTS stations WQNZ336 and WQJV762) satisfied the requirements for renewal under 47 CFR § 1.949(e)(2) and were granted on July 10, 2025 and July 11, 2025 respectively. *See* ULS File Nos. 0011534897 and 0011534922.

[26] *See* FCC*, Application for Radio Service Authorization*, *Main Form 601,* at 5-6, (Apr. 2025), https://www.fcc.gov/sites/default/files/fcc-form-601.pdf.

[27] 47 CFR § 1.949(f).

[28] *See, e.g.,* Letter from Brian D. Weimer, Counsel for Susan L. Ueker, Court-Appointed Receiver for Verde Systems LLC, to Marlene Dortch, Secretary, Federal Communications Commission (ULS File No. 001153486) (Filed Aug. 27, 2025) ("Amended Application Exhibit").

[29] Each of the eight Choctaw leases (L000060844, associated with AMTS license WQCP808; L000060845 (WQCP815); L000060846 (WQCP816); L000060847 (WQCP817); L000060851 (WQCP810); L000060852 (WQCP811); L000060853 (WQCP812); and L000060854 (WQCP814)) commenced on either March 19 or March 20, 2025, just a little over a month before the expiration of the licenses on April 26, 2025.

[30] Choctaw Telecommunications, https://choctawtelecom.com/. *See also* Assignment Application at 3 (referencing, *e.g.*, L000014987; L00006085[1]).

[31] The Receiver has submitted timely lease extension requests for all of her active AMTS lease agreements. As stated in footnote 2, *supra*, these applications are pending in ULS and will be resolved following the adoption of this Order.

rules,[32] ITMW had until March 29, 2011, or five years after its licenses were granted, to provide service to at least one-fifth of the population within each service area or to demonstrate "substantial service." On March 29, 2011, ITMW filed applications seeking an extension of time to construct the licenses and applications seeking to disaggregate the 352 licenses into 704 licenses and assign 352 of them to Skybridge Spectrum Foundation ("Skybridge"), another entity controlled by Havens. Under the assignment applications, Skybridge agreed to assume the performance obligations for the entire Economic Area in which the individual licenses are located, as permitted by then-existing section 101.1323(c) of the Commission's rules.[33] The Bureau granted the applications for extensions of time to construct the licenses and the applications to disaggregate the 352 licenses.[34] Thus, ITMW had no performance requirements attached to its 352 disaggregated licenses whereas Skybridge had to meet the performance requirements applicable to the entire Economic Area in which its licenses are located.

11. On March 29, 2016, Skybridge filed two sets of applications with respect to its MAS licenses – applications for a 12-month extension of time to demonstrate substantial service, and separate applications to renew the licenses. On March 14, 2018, the Bureau's Broadband Division denied Skybridge's extension requests, dismissed the renewal applications, and declared the 352 Skybridge licenses terminated.[35] Because the ITMW licenses did not have any construction requirements associated with them, those licenses were renewed.

12. ITMW filed timely renewal applications on March 25, 2026.[36] It answered "No" to the question as to whether it was currently providing service.[37]

III. DISCUSSION

A. Legal Standard

13. We may grant applications to renew licenses notwithstanding licensee failure to meet applicable performance requirements if we find that doing so serves the public interest.[38] For wireless radio services, including the AMTS and MAS licenses at issue here, applications must satisfy the renewal requirements set forth in section 1.949. For the March 2018 renewal application for 220 MHz License WQIM619, the Receiver must satisfy the renewal requirements set forth in former section 90.743.[39] The Commission may treat non-performance as grounds for denial or automatic termination under section

[32] 47 CFR § 101.1325(b).

[33] 47 CFR § 101.1323(c) (2011).

[34] *See Wireless Telecommunications Bureau Assignment of License Authorizations, Transfer of Control of Licensee Applications, De Facto Transfer Lease Applications and Spectrum Manager Lease Notifications, Designated Entity Eligibility Event Applications, and Designated Entity Annual Reports Action*, Public Notice, Report No. 10431 (Apr. 15, 2015) at 2; File Nos. 0004668905-0004669256 (granted Sep. 8, 2014).

[35] *Skybridge Spectrum Foundation*, Memorandum Opinion and Order, 33 FCC Rcd 8157 (WTB BD 2018), *recon. denied* Letter from John J. Schauble, Deputy Chief, Broadband Division, Wireless Telecommunications Bureau to Brian D. Weimer, Esq. (Oct. 19, 2023).

[36] *See* Appendix

[37] Renewal Applications, Response to Question 57.

[38] *See* 47 U.S.C. § 309(a).

[39] We note that the applicable renewal provisions in § 1.949 did not come into effect until September 28, 2020, and while each of the Receiver's renewal applications for her AMTS licenses were submitted on April 25, 2025 under the current renewal framework, the application to renew the 220 MHz License, WQIM619, was submitted on March 19, 2018, before the new rules came into effect. The renewal requirement applicable to 220 MHz geographic area licenses at that time was former section 90.743(a). Accordingly, we address waiver of the performance requirements at renewal under this previously applicable rule. *See* footnote 11, *supra*.

1.955[40] unless appropriate waiver relief is warranted. These requirements may be waived if (1) the underlying purpose of the rule would not be served or would be frustrated by application in the particular case, and a grant would be in the public interest, or (2) unique or unusual factual circumstance render strict compliance inequitable, unduly burdensome, or contrary to the public interest, and the applicant has no reasonable alternative.[41] These rules may also be waived by the Commission on its own motion if good cause is shown.[42]

14. *Renewal.* An applicant for renewal of an authorization of a covered site-based license or a covered geographic license must demonstrate that over the course of the license term, the licensee(s) provided and continue to provide service to the public, or operated and continue to operate the license to meet the licensee(s)' private, internal communications needs.[43] If an applicant for renewal cannot meet the renewal standard in 47 CFR § 1.949(d) by satisfying the requirements of one of the safe harbors in section 1.949(e), it must make a renewal showing, independent of its performance requirements, as a condition of renewal. The renewal showing must specifically address the renewal standard by including a detailed description of the applicant's provision of service (or, when allowed under the relevant service rules or pursuant to waiver, use of the spectrum for private, internal communication) during the entire license period.[44]

15. *Wireless Radio Service Report and Order*. In 2017, the Commission implemented a unified framework for the Wireless Radio Services which harmonized its regulatory approach to rules regarding, among other things, renewal, continuity of service, partitioning and disaggregation performance.[45] Recognizing that some licensees had not previously been subject to a renewal standard, the Commission provided a grace period for these entities to come into compliance, stating, "[w]e seek to provide sufficient time to geographic-area licensees that have yet to be subject to the renewal standard so that they can comply with the new standard (indeed, some licensees are not yet required to even demonstrate service over the license term)."[46] The Commission "determine[d] that the renewal standard and the renewal framework [would] take effect for such licensees on January 1, 2023, replacing the existing service-specific renewal rules, giving licensees at least five years to comply with our new renewal rules (giving all licensees sufficient time to show service over the license term, starting from the effective date of our new renewal rules)."[47] Accordingly, at a minimum, absent the grant of waivers, the Receiver would be required to show performance over the license term for each of the AMTS licenses at issue, dating back to September 28, 2020 (the effective date of the new renewal rules), in order to warrant renewal. For the MAS licenses, which do not have a performance requirement associated with them, the rules contemplate certifications that (1) the licensee continues to use its facilities to provide service or to

[40] 47 CFR § 1.955.

[41] 47 CFR § 1.925(b)(3).

[42] See 47 CFR § 1.3.

[43] 47 CFR § 1.949(d). With respect to the application to renew 220 MHz License WQIM619, submitted on March 19, 2018, the applicable renewal performance requirement was set forth in former section 90.743(a). *See* footnote 11, *supra*. Accordingly, the Receiver did not have a renewal "safe harbor" option under the prior rule.

[44] 47 CFR § 1.949(f).

[45] *Wireless Radio Services Reform, Second Report and Order*, WT Docket No. 10-112, FCC 17-105, 32 FCC Rcd 8874, 8875 para. 1 (2017) (*WRS R&O*).

[46] *Id*, 32 FCC Rcd at 8875, para. 1.

[47] *Id*. at 8890, para. 37. The specific rule sections of 49 CFR § 1.949 involving information collection requirements became effective on September 28, 2020. *See Uniform License Renewal, Discontinuance of Operation, and Geographic Partitioning and Spectrum Disaggregation Rules and Policies for certain Wireless Radio Services; Rules to Facilitate the Use of Vehicular Repeater Unites*, 85 Fed. Reg. 60,719 (Sep. 28, 2020) (codified at 47 CFR § 1.949).

further the applicant's private business or public interest/public safety needs and (2) that there has been no permanent discontinuance of operation.[48] For the 220 MHz License WQIM619, the Receiver would have been required to show "substantial service" over the license term ending in March 2018, pursuant to former section 90.763(b).[49]

16. *Substantial Service*. "Substantial service" is defined as "service which is sound, favorable, and substantially above a level of mediocre service which just might minimally warrant renewal."[50] The Commission's rules state that a "licensee may attribute to itself the build-out or performance activities of its spectrum lessee(s) for purposes of complying with any applicable build-out or performance requirement."[51]

B. Relief is Warranted on this Record.

17. *Waiver Relief*. We grant waivers to allow the processing of the renewal applications for the AMTS and MAS licenses and the 220 MHz license at issue here, subject to the conditions described below, based on our grant of limited waivers on our own motion and our finding that a grant in this case serves the public interest, convenience and necessity under Section 309(a) of the Communications Act of 1934, as amended.[52] The record demonstrates the existence of unique circumstances justifying the grant of these waivers, including the Receiver's diligent, good faith efforts to comply with the Commission's rules and her ongoing efforts to restore these licenses to active use after years of disruptive litigation followed by a protracted bankruptcy proceeding. Moreover, grant of these waivers will permit rather than thwart the continuation of critical lease operations as well as enable the Receiver to assign the AMTS and MAS licenses to Locke Wireless LLC, which will in turn endeavor to deploy the spectrum expeditiously.[53] We emphasize that our decision to grant relief is based on the totality of the unique circumstances present here, including the extensive history and litigation involving these licenses, as well as the nature of the licenses in question.

18. Specifically, with respect to the AMTS and MAS licenses, and subject to the conditions set forth herein, we waive on our own motion the renewal performance requirements specified under section 1.949 of the Commission's rules so that the subject licenses can be renewed and used to provide service.[54] Similarly, with respect to the 220 MHz license (WQIM619), we waive, on our own motion, the applicable part 90 construction requirements,[55] including the substantial performance requirements at renewal to authorize the license for a new ten-year term in former section 90.743(a).[56] For the 220 MHz

[48] 47 CFR § 1.949(e)(4).

[49] 47 CFR § 90.763(b) (repealed Jan. 1, 2023); *see also WRS R&O*, 32 FCC Rcd at 8890, para. 37.

[50] 47 CFR § 80.49(a)(3).

[51] 47 CFR § 1.9030(d)(5)(i). Section 90.259 of the Commission's rules permits low-power telemetry operations on AMTS spectrum on a secondary basis.

[52] 47 U.S.C. § 309(a).

[53] *See* Description of Transaction and Public Interest Statement, ULS File No. 0011686383, at 3 (filed Aug. 18, 2025) (Assignment Application).

[54] 47 CFR § 1.949.

[55] *See* 47 CFR § 90.767.

[56] 47 CFR § 90.743(a) (repealed Jan. 1, 2023) (Former section 90.743(a) read in pertinent part, that licenses requesting a renewal expectancy, must demonstrate in their application that "they have provided substantial service during their past license term. 'Substantial' service is defined in this rule as service that is sound, favorable, and substantially above a level of mediocre service that just might minimally warrant renewal,[…]"). We note here that at the time the Receiver submitted her renewal application for 220 MHz License WQIM619 on March 19, 2018, the new renewal rules codified at 1.949 were not yet in effect. The Commission regularly applies superseded or eliminated rules where the licensee's obligations attached before the subsequent rule changes. *See Pay Tel.*

(continued….)

license (WQIM619), we also grant the Receiver's request to waive sections 1.9020(h)[57] and (m)[58] in order to retroactively extend the term of Environmentel's lease with Southside Electric Cooperative. Environmentel's substantial service showing for renewal relies on SEC's lease activities. However, the initial lease expired on September 15, 2014, and therefore, we grant the Receiver's retroactive lease extensions to enable her to rely on SEC's continued operations to satisfy the renewal performance requirement.[59]

19. Furthermore, to enable the Receiver, or any party assigned the AMTS or MAS licenses, sufficient time to commence operations fully or to lease the spectrum consistent with the conditions set forth herein, we waive on our own motion section 1.953(b) of the Commission's rules prohibiting the permanent discontinuance of geographic area licenses[60] for three years after the date of this Order.

20. *Lease extensions*. We find good cause to grant the Receiver's lease extension request and waive section 1.9020(h) and (m) of our rules. With respect to 220 MHz License WQIM619, we must first address the status of the lease upon which the Receiver relies for her substantial service showing before we can resolve the application to renew this license. As stated above, the Receiver sought to cure this issue on November 20, 2019, by seeking a waiver of section 1.9020(h) in order to retroactively extend the lease from September 16, 2014, through the end of the license term on March 19, 2018.[61] We find that granting this lease extension is in the public interest. The extension request is part of the Receiver's efforts to cure defects in the administration of the licenses within her purview. Additionally, as stated in the waiver application, the lessee uses the license to enable fixed telemetry and Supervisory Control and Data Acquisition (SCADA) services, which support its "distribution of critical electric utility services to rural and sparsely populated areas in central and south Virginia."[62] We agree with the Receiver that strict application of section 1.9020(h) in this instance would not serve the underlying purpose of the Commission's spectrum leasing rules – to enhance economic opportunities and enable innovative communication services in rural areas, and to "facilitate[ ] the movement of spectrum toward new, higher valued uses."[63] Accordingly, we waive section 1.9020(h) and grant the Receivers request to extend the term of the spectrum manager lease for 220 MHz License WQIM619 between Environmentel and Southside Electric Cooperative from September 16, 2014, through the end of the previous license term on March 19, 2018. On this record and for these same reasons, we also grant Receiver's supplemental request to waive section 1.9020(m)[64] in order to retroactively extend the same lease for the full license

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Reclassification & Comp. Provisions of Telecommunications Act of 1996, 16 FCC Rcd. 8098, 8106 n. 46 (2001) ("In addressing violations of these regulations, we will continue to apply the regulations in effect at the time that the violation accrues."); *Bell-Delaware, Inc. v. MCI Telecommunications Corp.*, 17 FCC Rcd 15918, 15919 (2002) (Commission declined to apply revised payphone per-call compensation rules, but rather applied prior rules that were in effect at the time that the events at issue transpired).

[57] 47 CFR § 1.9020(h); *see* Section 1.9020(h) Waiver Request at 1.

[58] 47 CFR §§ 1.9020(m); s*ee* Section 1.9020(m) Waiver Request at 1.

[59] Additionally, to the extent necessary, we waive applicable sections of 1.903 (to address the time periods in which SEC was operating without lease authority) and 1.955(a) (to address automatic termination due to expiration of the lease in 2014). 47 CFR § 1.903; 47 CFR § 1.955 (a).

[60] *See* 47 CFR § 1.953(b).

[61] *See* ULS File no. 0008888568.

[62] *Id*. at 2.

[63] *Promoting Efficient Use of Spectrum Through Elimination of Barriers to the Development of Secondary Markets*, Second Report and Order, Order on Reconsideration, and Second Further Notice of Proposed Rulemaking, WT Docket No. 00-230, 19 FCC Rcd 17503, paras. 3, 111 (2004).

[64] *See* Section 1.9020(m) Waiver Request.

term, as renewed by this Order – commencing on March 20, 2018, and expiring on March 19, 2028.

21. *Renewal requirements*. We also find good cause to waive our performance requirements at renewal for the Receiver's AMTS, 220 MHz, and MAS licenses. Although the Receiver may attribute to herself the activities of her spectrum lessees in order to satisfy her performance requirements at renewal,[65] the extent of the lease activities in this case do not demonstrate service over the license term for any of the AMTS or MAS licenses in her possession. Furthermore, the Receiver did not seek a waiver of the performance or use requirements in section 1.949[66] or the Commission's strictures against permanent discontinuance contained in section 1.953.[67] Nor did the Receiver adequately demonstrate substantial service during the previous license term pursuant to former section 90.743(a) for her 220 MHz License WQIM619, due in large part to her reliance on an expired lease agreement (an issue now resolved by this Order).[68] Nevertheless, the record in this case supports a waiver of the performance requirements at renewal for each of these licenses.[69]

22. We find that special circumstances exist in this case, particularly in light of efforts to resolve longstanding litigation.[70] First, the Receiver has acted diligently to bring these licenses into compliance with FCC rules after years of litigation between Warren Havens and Arnold Leong, both now deceased. Renewing these licenses will serve the public interest by enabling the settlement of the Havens' Estate, placing the licenses under the control of Dr. Leong's family as directed by the Alameda Court, and bringing the receivership to a close.[71] Spectrum that has long been underutilized can now be deployed. Once assigned, the Leong family intends to deploy the licenses for internal or commercial services to companies that will use them for "critical information communications, industrial applications and other purposes."[72] Further, granting the renewals and accompanying assignment applications will enable the continued provision of service by current and active lessees, including Amtrak (for positive train control operations) and Choctaw Holdings (as part of Choctaw's network providing data from remote sensors to tower owners).[73] The assignee will continue to build upon the Receiver's efforts to deploy the spectrum under her control for "critical connectivity applications and use cases."[74] Therefore, we conclude that strict application of the renewal performance requirements in this case would not advance the underlying purpose of the renewal rules – to ensure service to the public and to prevent the warehousing of spectrum.

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[65] *See* 47 CFR § 1.9020(d)(5).

[66] 47 CFR § 1.949(d), (e)(4).

[67] 47 CFR § 1.953(b).

[68] *See* para. 17, *supra*.

[69] In particular, we agree with the Receiver that population coverage of its 220 MHz license (WQIM619), which at 61.27% is just shy of the two-thirds coverage requirement for the spectrum band, is sufficient to satisfy her performance requirement at renewal now that we have extended the term of the initial lease to SEC until the end of the license term ending on March 19, 2018. Accordingly, pursuant to the reinstatement of the lease to SEC, we will accept the Receiver's final construction notification (ULS File No. 008154916).

[70] *See Northeast Cellular Telephone Co. v. FCC*, 897 F.2d 1164, 1166 (citing *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969), aff'd, 459 F.2d 1203 (1973), cert. denied, 409 U.S. 1027 (1972)).

[71] *See* Assignment Application at 3. In *LaRose v. FCC*, for example, the D.C. Court of Appeals noted the public interest in harmonizing the Commission's findings with the interest in accommodating the constraints and duties imposed on a receiver in a bankruptcy proceeding. *See LaRose v. FCC*, 494 F.2d 1145, 1149, 161 U.S.App.D.C. 226, 230 (D.C. Cir. 1974).

[72] *See id*.

[73] *See id*.

[74] *Id*.

C. Renewal and Public Interest Finding.

23. Considering the totality of the circumstances, including the opportunity to resolve longstanding litigation, we are persuaded that grant of the renewal applications, subject to the conditions below, serves the public interest. We find that the Receiver's efforts to date to comply with FCC rules and to find productive lease arrangements to deploy the spectrum, her diligent efforts to resolve the Havens' Estate and bring the receivership to a close, and the Leong family's commitment to continue the deployment of the spectrum once assigned, will ensure timely performance.[75]

D. Temporary Waiver of Permanent Discontinuance Rules.

24. To allow the Receiver or her assigns adequate time to commence operations or to obtain adequate spectrum lease agreements for each of the AMTS and MAS licenses listed herein, we temporarily waive the permanent discontinuance requirements contained in section 1.953 for a period of three years from the date of the adoption of this Order (until September 1, 2029), consistent with the conditions set forth below.[76] Under section 1.3 of our rules, we find that there is good cause to temporarily waive our discontinuance rules to allow the parties time to develop and deploy spectrum licenses in accordance with the deployment time frame we establish herein, recognizing that these AMTS and MAS licenses, up to now, have been underutilized.[77]

IV. WAIVER CONDITIONS

25. To align renewal and assignment with the Commission's performance objectives, to mitigate against potential warehousing, and to protect the public interest, the grant of waivers in this Order is conditioned on the following requirements which must be met on a license by license basis for all AMTS and MAS licenses:

- *Interim Deployment Obligation*. For each of the AMTS and MAS licenses listed herein, within 3 years of the adoption of this Order (by September 1, 2029), demonstrate coverage and service to at least one-third of the population or one-third of the geographic area of each license. Failure to meet this Initial Deployment deadline will result in the automatic termination, without further Commission action, of each non-compliant license.
- *Final Deployment Obligation*. For each of the AMTS and MAS licenses listed herein, within 5 years of the adoption of this Order (by September 1, 2031), demonstrate coverage and service to at least two-thirds of the population or two-thirds of the geographic area of each license. Failure to meet this Final Deployment deadline will result in the automatic termination, without further Commission action, of each underutilized license.
- *Reporting requirements*. Licensees operating under this Waiver Order must report as follows on progress towards performance benchmarks to ensure that the Commission is aware of challenges well in advance of deadlines: (1) Within 1 year of the adoption of this Order (by September 1, 2027), the License holder must submit a construction/operations or a leasing progress report detailing how it will meet the 3 year leasing requirement or the interim deployment obligation as applicable. (2) Within 3 years of the adoption of this Order (by September 1, 2029), the License holder must, if applicable, submit a construction/operations progress report detailing how it will meet the 5 year Final Deployment Obligation. These reports must be submitted via the Commission's Universal Licensing System as pleadings attached to each license. Failure to meet these reporting deadlines will result in the automatic

[75] *See id*.

[76] Note that this temporary waiver of the permanent discontinuance rules, as well as imposition of the associated buildout conditions listed in Section IV of this Order, do not apply to 220 MHz License WQIM619 since, pursuant to this Order, the Receiver has already fulfilled her buildout requirements. *See* para. 21, n.69, *supra*.

[77] *See* 47 CFR § 1.3.

termination, without further Commission action, of each license for which the Licensee fails to submit a timely progress report.

- *Permanent Discontinuance*. As part of the waiver relief granted by this Order, we suspend, on our own motion, application of the discontinuance rules (47 CFR § 1.953(b)) to each of the AMTS and MAS licenses listed herein for 3 years following the adoption of this Order.[78] Licensees providing service to the public, or operating the license to meet their own private, internal communications needs, or that elect to lease their spectrum in order to satisfy their performance requirements, must maintain continuity of service to at least one-third of the population or one-third of the geographic area of each license after September 1, 2029. After September 1, 2031, Licenses providing service to the public, or operating the license to meet their own private, internal communications needs, or that elect to lease their spectrum in order to satisfy their performance requirements, must maintain continuity of service to at least two-thirds of the population or two-thirds of the geographic area of each license. Failure to maintain continuity of service or coverage after September 1, 2029, will result in automatic termination, without further Commission action, of each license found to have permanently discontinued (*i.e.*, determined to have been non-operational for 180 consecutive days).

26. All requirements and conditions listed above will also apply to any assignee or transferee of any of the Licenses.

V. CONCLUSION AND ORDERING CLAUSES

27. Accordingly, having reviewed the record in this matter, IT IS ORDERED, pursuant to Sections 4(i), 4(j), and 303(r) of the Communications Act of 1934, as amended, 47 U.S.C. §§ 154(i), 154(j), and 303(r), and sections 1.3, 1.946, and 1.949 of the Commission's rules, 47 CFR §§ 1.3, 1.946, and 1.949, that the Wireless Telecommunications Bureau GRANTS ON ITS OWN MOTION a waiver of sections 1.949(d) and (f) for Automated Maritime Telecommunications System stations WQCP808, WQCP810, WQCP811, WQCP812, WQCP813, WQCP814, WQCP815, WQCP816, WQCP817, 220 MHz License WQIM619, and the Multiple Address System licenses listed in Appendix A to this Order, to the extent described herein and subject to the conditions specified above.

28. IT IS FURTHER ORDERED, pursuant to Sections 4(i), 4(j), and 303(r) of the Communications Act of 1934, as amended, 47 U.S.C. §§ 154(i), 154(j), and 303(r), and sections 1.3, 1.903, and 1.955 of the Commission's rules, 47 CFR §§ 1.3, 1.903, and 1.955, that the Wireless Telecommunications Bureau GRANTS ON ITS OWN MOTION a waiver of sections 1.903 and 1.955(a) for any unauthorized lease operations under 220 MHz License WQIM619 that occurred after September 16, 2014, to the extent described herein and subject to the conditions specified above.

29. IT IS FURTHER ORDERED, pursuant to Sections 4(i), 4(j), and 303(r) of the Communications Act of 1934, as amended, 47 U.S.C. §§ 154(i), 154(j), and 303(r), and sections 1.3, 1.946, 90.767, and former section 90.743(a) of the Commission's rules, 47 CFR §§ 1.3, 1.946, 90.767, and former section 90.743(a), that the Wireless Telecommunications Bureau GRANTS ON ITS OWN MOTION a waiver of section 90.767 and former section 90.743(a) for 220 MHz License WQIM619 to the extent described herein and subject to the conditions specified above.

30. IT IS FURTHER ORDERED, pursuant to Sections 4(i) and 303 of the Communications Act of 1934, as amended, 47 U.S.C. §§ 154(i), 303, and Sections 1.925 and 1.9020(h) of the Commission's rules, 47 CFR §§ 1.925 and 1.9020(h), that section 1.9020(h) IS HEREBY WAIVED for 220 MHz License WQIM619.

31. IT IS FURTHER ORDERED, pursuant to Sections 4(i) and 303 of the Communications

[78] *See* para. 21, *supra*.

Act of 1934, as amended, 47 U.S.C. §§ 154(i), 303, and Sections 1.925 and 1.9020(m) of the Commission's rules, 47 CFR §§ 1.925 and 1.9020(m), that section 1.9020(m) IS HEREBY WAIVED for 220 MHz License WQIM619

32. IT IS FURTHER ORDERED, pursuant to sections 1.3 and 1.955 of the Commission's rules, 47 CFR §§ 1.3 and 1.953, that the Wireless Telecommunications Bureau GRANTS ON ITS OWN MOTION a waiver of section 1.953(b) until September 1, 2029, for Automated Maritime Telecommunications System stations WQCP808, WQCP810, WQCP811, WQCP812, WQCP813, WQCP814, WQCP815, WQCP816, and WQCP817, and for the Multiple Address System licenses listed in Appendix A to this Order, to the extent described herein and subject to the conditions specified above.

33. IT IS FUTHER ORDERED, that the licensing staff of the Wireless Telecommunications Bureau's Broadband Division SHALL PROCESS all pending renewal applications, construction notifications, lease applications, and extension requests filed by Susan L. Uecker for Automated Maritime Telecommunications System stations WQCP808, WQCP810, WQCP811, WQCP812, WQCP813, WQCP814, WQCP815, WQCP816, WQCP817, 220 MHz Service license WQIM619, and the Multiple Address System licenses listed in Appendix A, in a manner consistent with this Order.

34. This action is taken under delegated authority pursuant to sections 0.131, 0.331, and 1.3 of the Commission's rules, 47 CFR §§ 0.131, 0.331, and 1.3.

FEDERAL COMMUNICATIONS COMMISSION

Joshua Smith
Chief, Broadband Division
Wireless Telecommunications Bureau

Appendix A
Intelligent Transportation & Monitoring Wireless LLC Pending Renewal Applications

File Number | Call Sign

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0011961263 | WQER216
0011961269 | WQER361
0011961274 | WQER360
0011961286 | WQER359
0011961293 | WQER358
0011961299 | WQER357
0011961319 | WQER356
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0011961791 | WQER362
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0011961911 | WQER370
0011961912 | WQER333
0011961916 | WQER332
0011961917 | WQER331
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0011961935 | WQER373
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File Number | Call Sign

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0011962151 | WQER378
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0011962808 | WQER382
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0011962831 | WQER395
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0011963606 | WQER263
0011963620 | WQER262
0011963632 | WQER261
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